

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
	:	
CRAIG BRADLEY DEIMLER AND	:	
WILLIAM OLIVER FISHER	:	
DEIMLER	:	
	:	
DEBTORS	:	
	:	
CAPITAL REGION WATER	:	CASE NO.: 1:20-BK-00841
	:	
OBJECTOR	:	
	:	
v.	:	
	:	
CRAIG BRADLEY DEIMLER AND	:	
WILLIAM OLIVER FISHER	:	
DEIMLER	:	
	:	
RESPONDENTS	:	

CAPITAL REGION WATER'S OBJECTION TO CHAPTER 13 PLAN

AND NOW comes Capital Region Water, by and through its attorneys, Salzmann Hughes, P.C., who files this objection to the confirmation of the above-referenced debtors' plan for the following reasons:

1. Debtors' plan fails to account for Claim #2, filed on March 19, 2020, by Capital Region Water in the amount of one thousand three hundred eighty-eight dollars and ninety-nine cents (\$1,388.99).
2. Debtors' plan fails to account for Claim #3, filed on March 19, 2020, by Capital Region Water in the amount of eight hundred fifty-seven dollars and ninety-one cents (\$857.91).
3. The Debtors' plan does not provide for curing of the correct pre-petition arrearage amounts, as listed above.

WHEREFORE, Capital Region Water respectfully requests that this Honorable Court grant its Objection to Debtors' plan, deny confirmation of Debtors' plan, and dismiss this case, or in the alternative, direct the Debtors to amend the plan in accordance with this objection.

Respectfully submitted,

Dated: September 2, 2020

/S/ Clinton J. Webb

Clinton J. Webb, Esquire
Salzmann Hughes, P.C.
Supreme Ct. ID No. PA 326403
79 St. Paul Drive
Chambersburg, PA 17201
(717) 263-2121
Counsel for Claimant, Capital Region
Water

CERTIFICATE OF SERVICE

I hereby certify that I have served the within Objection by electronically notifying parties or United States Mail, postage prepaid, first class mail, addressed to the following:

Dorothy Mott, Esq.
125 State Street
Harrisburg, PA 17101

Charles J. Dehart, III, Esq.
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Respectfully submitted,

Dated: September 2, 2020

/S/ Clinton J. Webb
Clinton J. Webb, Esquire
Salzmann Hughes, P.C.
Supreme Ct. ID No. PA 326403
79 St. Paul Drive
Chambersburg, PA 17201
(717) 263-2121
Counsel for Claimant, Capital Region
Water